

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Sharon R. Baird,

Debtor

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Case No: 17-10540

Chapter 13

**MOTION FOR ADDITIONAL 10 DAY EXTENSION OF TIME TO FILE CHAPTER 13
PLAN DOCUMENTS RE: SUDDEN COMPUTER SOFTWARE FAILURE**

Due to sudden, unforeseen and presently inexplicable failure this date of undersigned counsel's ability to type on computer fill-in-blanks Chapter 13 forms available over the Internet, Debtor's counsel respectfully asks this Honorable Court for an additional 10-day extension of time to resolve said issues, which may be result of an heretofore unknown computer virus now infecting Counsel's laptop computer (and may compel Counsel to ultimately use public access computer at Counsel's local library), and file subject Chapter 13 Plan, together with the necessary and related forms, schedules and documents, on or before March 18, 2017.

In the coming days, Debtor's counsel plans to be guided by Counsel's computer hardware and software provider (Acer Computers), the program administrator of the www.ph13trustee.com website and/or by the IT Department of the PAEB Clerk's Office, and to work toward a solution (failing same by Tuesday, March 14, 2017 Counsel will relocate Wednesday, March 15, 2017 to computers available to Counsel via Burlington County Library System, Burlington County, NJ) and, in the interim, respectfully begs the Court permit Debtor until March 18, 2017 to file Debtor's prepared Chapter 13 Plan and related forms, schedules and documents.

Respectfully submitted:

<u>s/ Peter Blust</u>	<u>3-8-2017</u>
Signature of Attorney	Date